



THE BROOKINGS INSTITUTION

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August 1, 2007

Brian Harris-Kojetin, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget, NEOB, Room 10201
725 17th Street, NW
Washington, DC 20503

via e-mail: bharrisk@omb.eop.gov

RE: Request for comments regarding proposed 2008 Census Dress Rehearsal

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice placed by the Department of Commerce in the June 27, 2007 Federal Register asking for comments regarding plans for the 2008 Census Dress Rehearsal.

MPP promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we view the 2010 Census as vital to the health and well-being of metropolitan America. The 2008 Census Dress Rehearsal is a critical, necessary step in the iterative series of tests the Census Bureau has undertaken since 2003 to evaluate new or improved question wording and questionnaire design, methodologies, and use of technology in preparation for the 2010 Census.

We find that the choice of test sites is logical and appropriate. In addition, we support the methodology for data collection, with one major exception. As noted in our previous letters to OMB regarding MAF/TIGER (March 8, 2007) and the census coverage measurement (CCM) independent listing and relisting operation (April 13, 2007), we are concerned that the Census Bureau has no plan to properly list and evaluate coverage of the addresses at small apartment buildings that lack unique apartment designations or labels. Since our previous letters, early 2008 Census Dress Rehearsal work in San Joaquin County, California has supported our concerns and confirmed previous Census Bureau research on the difficulties of accurately listing units in such buildings. Those difficulties will most certainly lead to both omission and duplication errors.

Without an adequate plan for this aspect of the address-listing program, we believe the quality, utility, and clarity of the census information to be collected will be compromised. In addition, we are concerned about the lack of a backup plan for the 2010 Census to properly cover and evaluate the count of such apartment units and the population living in them.

Consequently, we recommend that OMB require the Census Bureau to present a plan to ensure that households in small multi-unit buildings are included in the census count and to evaluate coverage of such households. We are very pleased to see that OMB's terms of clearance for MAF/TIGER and the CCM listing/relisting operation require the Census Bureau to meet with OMB to discuss the status of plans and research for enumerating households in small multi-unit addresses. We ask that similar terms of clearance be used in the case of the 2008 Census Dress Rehearsal as well. We also suggest that OMB ask the Census Bureau to indicate the role of the Dress Rehearsal in such plans and research.

In conclusion, MPP strongly supports the conduct of the 2008 Census Dress Rehearsal and asks that the Census Bureau consider our recommendation for improvement. We hope you find our comments of value, and thank you for the opportunity to provide them.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" and last name "Reamer" clearly distinguishable.

Andrew Reamer, Fellow
Metropolitan Policy Program